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July 27, 1982

Stephen Shakman, Esq.
Minnesota Pollution Control Agency
1935 W. County Road B2
Roseville, Minnesota 55113

Re: U.S. v. Reilly Tar & Chemical Corp.

Dear Steve:

As I explained at the Finch deposition last week, you need not be concerned with my willingness to produce copies of water samples or analyses generated by Reilly Tar or its consultants. I will send you copies of the analytical results from the samples recently collected at Well 23. In addition, pursuant to the request contained in your letter of July 19, 1982, I will send you the analytical results of any other samples which Reilly has done or will be doing in St. Louis Park.

I am sorry if there was any misunderstanding in my conversation with Erica Dolgin. I had called her to discuss the scheduling of depositions that I wanted to take and in the course of the conversation she asked me a question concerning the existence of any understanding with respect to document production. While I will not attempt to quote her verbatim, I believe she asked whether there was a general understanding that we would produce copies of "anything we had." I felt that that was far too general a request and told her that if any party to the lawsuit wanted me to produce any discoverable information, they should specifically ask for it. You have now done so in your letter of July 19, 1982, as well as in the previous document production requests, and, of course, it is not necessary for you to serve a formal discovery request.

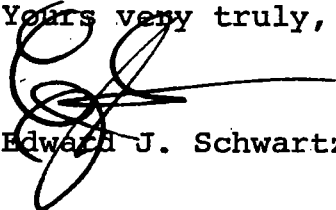


Stephen Shakman, Esq.
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July 27, 1982

I would appreciate it if you would send me the results of the "round robin" series of tests which I requested in my letters of November 16, 1981 and March 16, 1982.

Yours very truly,



Edward J. Schwartzbauer

EJS:ml

cc: Erica Dolgin
Francis X. Hermann
Robert E. Leininger
Allen Hinderaker
Mike Hansel